

**ALLEN & OVERY**

**BY ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

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June 8, 2022

**United States v. Mario Rodriguez, No. 20 Cr. 301 (PKC)**

Dear Judge Castel:

We represent the defendant, Mario Rodriguez, in the above-captioned matter, and write to respectfully request an adjournment of the conference that is currently scheduled for 3 p.m. on June 14, 2022.

We request an adjournment of 60 days to 3 p.m. on August 15, 2022, or at such date and time as Your Honor prefers, in order to continue to review the voluminous discovery in this matter, to evaluate potential motions, and to have discussions with the government regarding a potential disposition of this matter. We consent to the exclusion of the time between June 14, 2022 and the date of the next conference in computing time under the Speedy Trial Act.

There have been no previous requests for adjournment or extension in this matter, and the government consents to this request. We are available to answer any questions Your Honor may have.

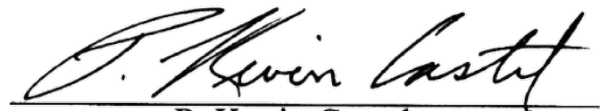
Respectfully submitted,

/s/ Eugene Ingoglia

**Eugene Ingoglia**  
Partner

Upon the application of defense counsel, consented to by the government, the pretrial conference previously scheduled for June 14, 2022 is adjourned until September 1, 2022 at 2:00 p.m. in Courtroom 11D. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. My reasons for this finding are that the grant of the continuance is needed to permit the parties to continue reviewing discovery, to evaluate potential motions, and to discuss a potential disposition of this matter. Accordingly, the time between today and September 1, 2022 is excluded.  
SO ORDERED.  
Dated: 6/9/2022

CC: AUSA Nicholas Chiuchiolo, AUSA Peter Davis

  
P. Kevin Castel  
United States District Judge

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